

From: CANDY MORIN <EPA4213@epa.state.il.us>
To: R5WST.R5WASTE (MCATEER-MICHAEL)
Date: 11/2/99 3:54pm
Subject: Sauget Area 1 - TSCA Technical Requirements -Forwarded -Reply

Mike

Checked with one of our RCRA mgrs and he had several technical comments. I do not intend to provide you with a formal response unless you or Kevin request it. So, here are some things that he and I discussed and I offer them for your consideration.

1. GCL vs. 3 feet of compacted clay - It's fairly easy to demonstrate that GCL can achieve the required permeability; however, you do not get the same level of protection with GCL. Some issues with GCL are spelled out at item 2.0. Use of less than 3 feet of compacted clay in combination with a GCL could provide better protection than GCL alone.

2. Flood protection - Locating a TSCA cell in this area which is potentially susceptible to flooding is a major concern. There must be sound answers to the "why here" question, and I think that some of those are included in the explanations at item 4.0.

3. Groundwater Monitoring - Expand the discussion regarding a minimum of three wells. Include upgradient, downgradient, perhaps crossgradient, and deep/shallow aquifer. Also, three wells is likely insufficient to characterize groundwater conditions for a project like this one and that should be made clear to everyone.

cc: Terry Ayers

CC: R5CHG.IN("EPA4126@epa.state.il.us")